

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CODING TECHNOLOGIES, LLC,	§	
	§	
Plaintiff,	§	Case No:
	§	
vs.	§	PATENT CASE
	§	
CNH INDUSTRIAL AMERICA, LLC	§	
	§	
Defendant.	§	
<hr style="width: 45%; margin-left: 0;"/>	§	

COMPLAINT

Plaintiff Coding Technologies, LLC (“Plaintiff” or “CT”) files this Complaint against CNH Industrial America, LLC (“Defendant” or “CNH”) for infringement of United States Patent No. 8,540,159 (the “ ‘159 Patent”).

PARTIES AND JURISDICTION

1. This is an action for patent infringement under Title 35 of the United States Code. Plaintiff is seeking injunctive relief as well as damages.

2. Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331 (Federal Question) and 1338(a) (Patents) because this is a civil action for patent infringement arising under the United States patent statutes.

3. Plaintiff is a Texas limited liability company with a place of business at 1801 NE 123 Street, Suite 314, Miami, FL 33181.

4. On information and belief, Defendant is a Delaware limited liability company with an address of 700 State Street, Racine, WI 53404. On information and belief, Defendant may be served through its agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange St., Wilmington, DE 19801.

5. This Court has personal jurisdiction over Defendant because Defendant has committed, and continues to commit, acts of infringement in this District, has conducted business in this District, and/or has engaged in continuous and systematic activities in this District.

6. Upon information and belief, Defendant's instrumentalities that are alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in this District.

VENUE

7. On information and belief, venue is proper in this District under 28 U.S.C. § 1400(b) because Defendant is deemed to be a resident of this District.

COUNT I **(INFRINGEMENT OF UNITED STATES PATENT NO. 8,540,159)**

8. Plaintiff incorporates paragraphs 1 through 7 herein by reference.

9. This cause of action arises under the patent laws of the United States and, in particular, under 35 U.S.C. §§ 271, *et seq.*

10. Plaintiff is the owner by assignment of the '159 Patent with sole rights to enforce the '159 Patent and sue infringers.

11. A copy of the '159 Patent, titled "Method for Providing Mobile Service Using Code-pattern," is attached hereto as Exhibit A.

12. The '159 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

13. Upon information and belief, at least through internal testing, Defendant has infringed and continues to infringe one or more claims, including at least Claim 1 of the '159 Patent by using and/or incorporating code patterns in connection with promotional media

distributed by and/or controlled by Defendant in a manner covered by one or more claims of the '159 Patent. Defendant has infringed and continues to infringe the '159 Patent in violation of 35 U.S.C. § 271.

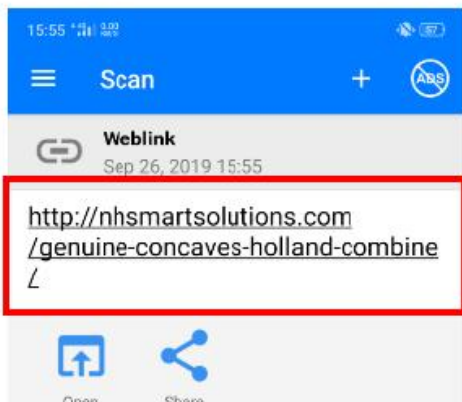
14. Regarding Claim 1, at least through internal use and testing, Defendant provides content (e.g., a website with promotional information) with the use of a code pattern (e.g., a QR code) in connection with promotional media containing the code pattern. The content is provided by a user terminal (e.g., a smartphone or other device capable of scanning the code pattern). Certain aspects of this element are illustrated in the screenshots below.



QR Code



SCAN



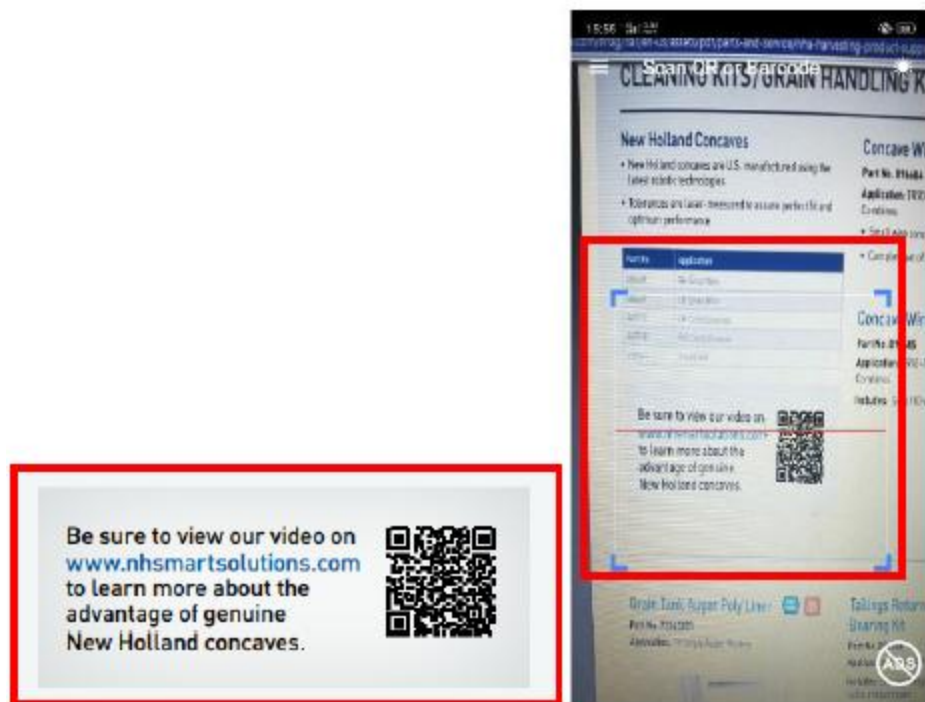
DECODE



ACTION

Source: <https://assets.cnhindustrial.com/nhag/nar/en-us/assets/pdf/parts-and-service/nha-harvesting-product-support-catalog-2017-pm-17723.pdf>

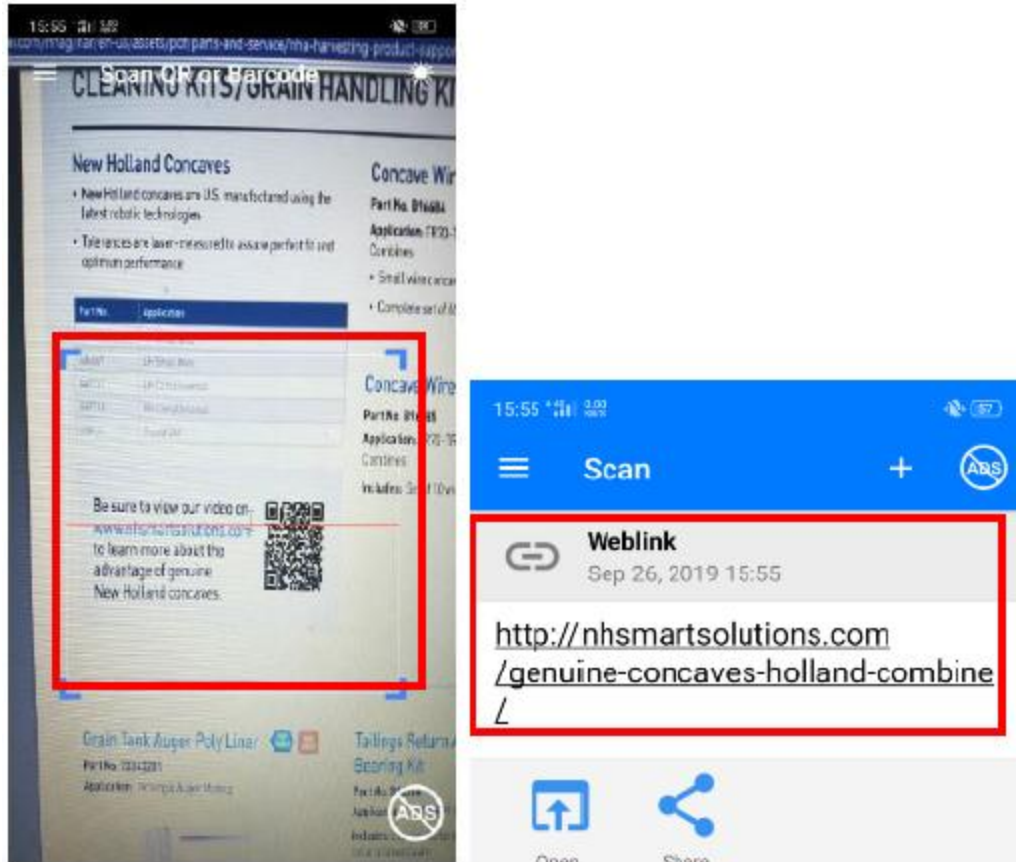
15. A photographic image of the code pattern (e.g., image of QR code) is obtained using a camera of the user terminal (e.g., the camera of the smartphone). These elements are illustrated in the screenshots below and/or in screenshots provided in connection with other allegations herein.



Source: <https://assets.cnhindustrial.com/nhag/nar/en-us/assets/pdf/parts-and-service/nha-harvesting-product-support-catalog-2017-pm-17723.pdf>

Source: Actual usage of product

16. A processor of the user terminal processes the photographic image of the code pattern to extract the code pattern (e.g., image of QR code) from the photographic image. The extracted code pattern can be viewed by the user. Certain aspects of this element are illustrated in the screenshots below and/or screenshots referenced in other paragraphs herein.



Source: <https://assets.cnhindustrial.com/nhag/nar/en-us/assets/pdf/parts-and-service/nha-harvesting-product-support-catalog-2017-pm-17723.pdf>

Source: Actual images of usage

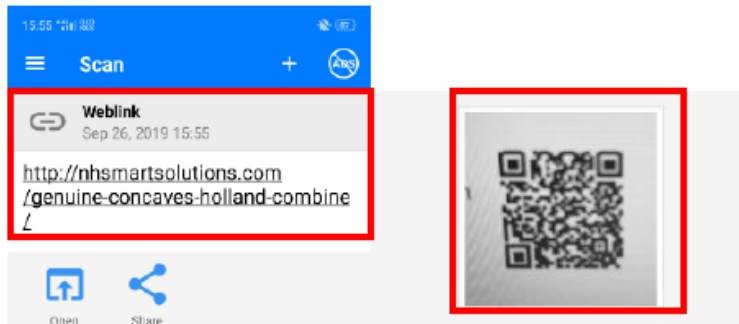
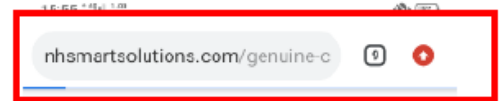
17. The extracted code pattern is decoded by the processor of the user terminal (e.g., smartphone processor) into code information (e.g., the URL of the web page associated with Defendant). For example, the smartphone decodes the QR code on the object image captured from the smartphone's camera to obtain a decoded hyperlink. Certain aspects of this element are illustrated in the screenshots below and/or screenshots referenced in other paragraphs herein.



Source: <https://assets.cnhindustrial.com/nha/nar/en-us/assets/pdf/parts-and-service/nha-harvesting-product-support-catalog-2017-pm-17723.pdf>

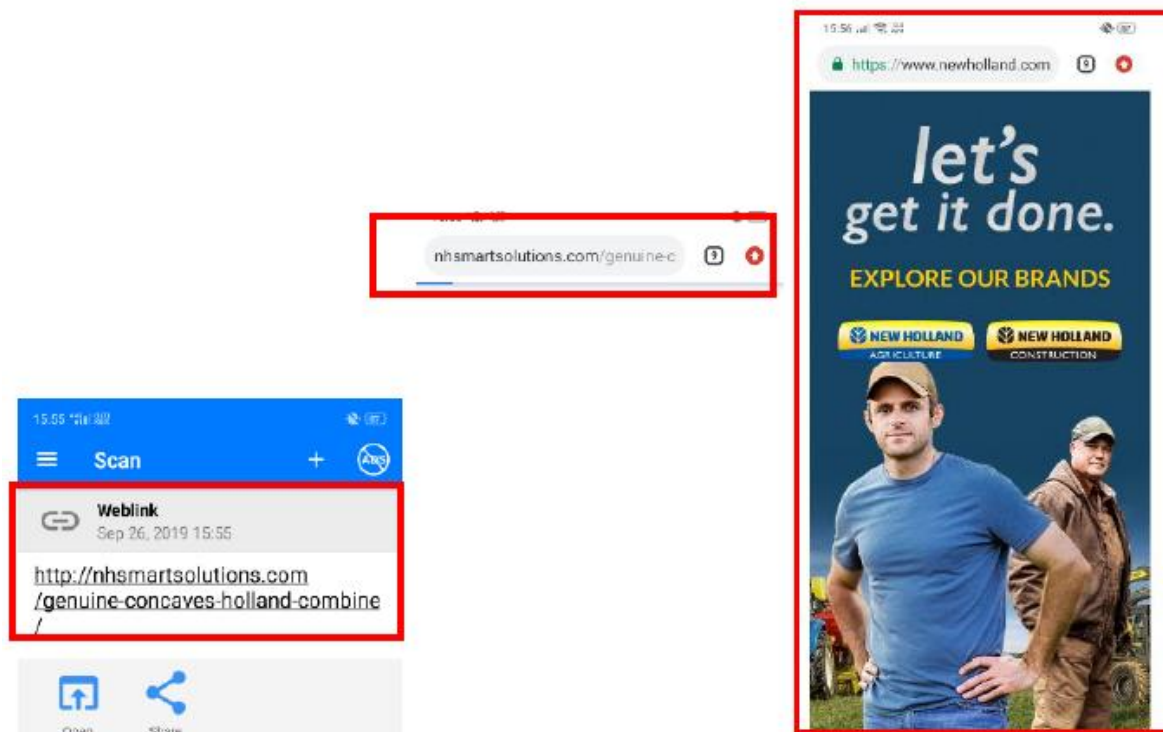
Source: Actual images of usage

18. A content information request message is sent to a server based on the code information. For example, a content information request message (e.g., http request message for accessing the webpage associated with Defendant) is transmitted to a server (e.g., Defendant's server) based on the code information (e.g., URL of the webpage associated with Defendant). Once the URL is decoded from the extracted QR code, a request for accessing a webpage associated with Defendant is sent to Defendant's server. For example, the smartphone sends the information associated with the QR code to Defendant's server. Certain aspects of this element are illustrated in the screenshots below and/or those referenced in other paragraphs herein.



Source: Actual usage of product

19. Defendant practices receiving content information (e.g., a web page associated with Defendant) from the server (e.g., Defendant's server) in response to the content information request message. The terminal (e.g., smartphone) receives Defendant's webpage. For example, after clicking on the hyperlink that is obtained by scanning the QR code associated with the product, the smartphone receives the information about the product from Defendant's server. Certain aspects of this element are illustrated in the screenshots below and/or those referenced in other paragraphs herein.



Source: Actual usage of product

20. Defendant's actions complained of herein will continue unless Defendant is enjoined by this court.

21. Defendant's actions complained of herein are causing irreparable harm and monetary damage to Plaintiff and will continue to do so unless and until Defendant is enjoined and restrained by this Court.

22. Plaintiff is in compliance with 35 U.S.C. § 287.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff asks the Court to:

(a) Enter judgment for Plaintiff on this Complaint on all causes of action asserted herein;

(b) Enter an Order enjoining Defendant, its agents, officers, servants, employees, attorneys, and all persons in active concert or participation with Defendant who receive notice

of the order from further infringement of United States Patent No. 8,540,159 (or, in the alternative, awarding Plaintiff running royalties from the time of judgment going forward);

(c) Award Plaintiff damages resulting from Defendant's infringement in accordance with 35 U.S.C. § 284;

(d) Award Plaintiff pre-judgment and post-judgment interest and costs; and

(e) Award Plaintiff such further relief to which the Court finds Plaintiff entitled under law or equity.

Dated: March 1, 2020

Respectfully submitted,

/s/ Jimmy Chong

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ATTORNEYS FOR PLAINTIFF

EXHIBIT A